

### LIST OF EXHIBITS

- Exhibit A: Plaintiffs' First Request for Production of Documents, dated December 17, 2004;
- Exhibit B: Amended Case Management Order, signed by Magistrate Judge Alfred G. Nicols, Jr., dated December 17, 2004;
- Exhibit C: Good Faith Certificate signed by Eric Thompson, Counsel for Plaintiffs, and Betty Mallett, Counsel for Defendants, dated May 11, 2005;
- Exhibit D: Defendants' Response to Plaintiffs' First Request for Production of Documents, dated March 4, 2005;
- Exhibit E: *Schwab v. Wyndham Int'l, Inc.*, No. 3-04-CV-1748-L, 2005 WL 697425 (N.D. Tex. Mar. 8, 2005) and *Alonso v. Agrinetics, Inc.*, No. Civ.A.B.-04-005, 2004 WL 2668801 (S.D. Tex. Nov. 15, 2004);
- Exhibit F: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated February 8, 2005;
- Exhibit G: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated February 17, 2005;
- Exhibit H: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated February 23, 2005;
- Exhibit I: Privilege Log Submitted by Defendants for the redacted Named Plaintiff Jamison J.'s case record entries;
- Exhibit J: Letter from Betty Mallett, Counsel for Defendants, to Eric Thompson, Counsel for Plaintiffs, dated February 16, 2005;
- Exhibit K: Relevant pages from the transcript of the deposition of DFCS caseworker Yutaska Simpson, October 2, 2004;
- Exhibit L: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated October 28, 2004;
- Exhibit M: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated March 11, 2005;
- Exhibit N: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated March 25, 2005;

- Exhibit O: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated March 31, 2005;
- Exhibit P: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated April 5, 2005;
- Exhibit Q: Letter from Betty Mallett, Counsel for Defendants, to Eric Thompson, Counsel for Plaintiffs, dated April 6, 2005
- Exhibit R: Document produced by Defendants Entitled "MACWIS Reports," Bates Nos. DHS 20101-109;
- Exhibit S: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated April 13, 2005;
- Exhibit T: State Quality Improvement Quarterly Report, 2003, at Bates No. DHS 009879;
- Exhibit U: Child and Family Services Plan, 2003, at Bates Nos. DHS 017235, 017301, and 017322;
- Exhibit V: Letter from Betty Mallett, Counsel for Defendants, to Eric Thompson, Counsel for Plaintiffs, dated March 30, 2005;
- Exhibit W: Letter from Eric Thompson, Counsel for Plaintiffs, to Betty Mallett, Counsel for Defendants, dated April 29, 2005;
- Exhibit X: Selected pages from the DHS Self-Assessment, dated December 2003, Bates Nos. P001952, 001958, 001960, 001965, and 001970;
- Exhibit Y: Document produced by Defendants entitled "Direct Service Primary Clients by Region;"
- Exhibit Z: Document produced by Defendants, December 8, 2003 Memorandum from Linda Barnes to Wanda Gillom and Gloria Salter, Bates No. DHS 020061;
- Exhibit AA: *Collins v. Coastline Constr., Inc.*, Civ. A. No. 92-16, 1992 WL 125328, (E.D. La. 1992);
- Exhibit BB: Pages 45-51 of the transcript of the deposition of DFCS employee Kathy Triplett, dated October 20, 2004;
- Exhibit CC: U.S. Department of Health and Human Services, Administration for Children and Families, Children's Bureau "Key Findings Report, Mississippi Department of Human Services," available at

<http://www.acf.hhs.gov/programs/cb/cwrp/key/findings04/ms.htm>,  
accessed on May 25, 2005;

Exhibit DD-P1: *Zubulake v. UBS Warburg LLC*, No. 02-1243, 2004 WL 1620866  
(S.D.N.Y. July 20, 2004); *Wiginton v. CB Richard Ellis, Inc.*, No. 02-  
6832, 2004 WL 1895122 (N.D. Ill. Aug. 10, 2004).

Exhibit DD-P2: *Zubulake v. UBS Warburg LLC*, No. 02-1243, 2004 WL 1620866  
(S.D.N.Y. July 20, 2004); *Wiginton v. CB Richard Ellis, Inc.*, No. 02-  
6832, 2004 WL 1895122 (N.D. Ill. Aug. 10, 2004);